

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity as SECRETARY OF THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, et al.,

Defendants.

Case No. 1:25-cv-00196-MRD

DECLARATION OF ANDRES IVAN NAVEDO

Pursuant to 28 U.S.C. § 1746, I, Andres Ivan Navedo, do hereby state:

1. I am an Assistant Attorney General in the Office of the Attorney General for the State of New York, and I appear on behalf of the State of New York in this action and am a member in good standing of the bar of the State of New York.

2. I am admitted to appear in this action in the United States District Court for the District of Rhode Island pursuant to this Court's Text Order from May 6, 2025.

3. I submit this Declaration and its attached Exhibits in support of Plaintiff States' Opposition to Defendants' Motion to Modify the Preliminary Injunction.

4. I make the following statements on the basis of my own knowledge or a review of files in my possession.

5. For the ease of the Court and the parties, I have begun numbering the exhibits to my declaration at Exhibit 78 because the May 9, 2025, Declaration of Andres Ivan Navedo, ECF No. 44 (First Navedo Declaration), together with the May 19, 2025, Declaration of Molly Brachfeld, ECF No. 55 (Brachfeld Declaration), attached Plaintiffs' Exhibits 1-77.

6. Attached as Exhibit 78 is a true and accurate copy of the Supplemental Declaration of Dr. Jerome Larkin, M.D., Director of the Rhode Island Department of Health. This is a supplemental declaration by the same declarant who submitted Exhibit 24 to First Navedo Declaration, ECF No. 44-24.

7. Attached as Exhibit 79 is a true and accurate copy of the Supplemental Declaration of Katie Eilers, Director of the Office of Family and Community Health Improvement at the Washington State Department of Health. This is a supplemental declaration by the same declarant who submitted Exhibit 27 to the First Navedo Declaration, ECF No. 44-27.

8. Attached as Exhibit 80 is a true and accurate copy of the Declaration of Yolanda Jacobs, President of the American Federation of Government Employees (AFGE) Local 2883.

9. Attached as Exhibit 81 is a true and accurate copy of the Supplemental Declaration of Kristin J. Cummings, MD, MPH, ATSF, Public Health Medical Administrator and Branch Chief of the Occupational Health Branch, of the California Department of Public Health. This is a supplemental declaration by the same declarant who submitted ECF No. 44-52.

10. Attached as Exhibit 82 is a true and accurate copy of the Second Supplemental Declaration of John Doe 2. This is the third declaration by John Doe 2 who previously submitted Exhibit 47 to the First Navedo Declaration, ECF No. 44-47, and Exhibit 68 to the Brachfeld Declaration, ECF No. 55-3.

11. Attached as Exhibit 83 is a true and accurate copy of the Supplemental Declaration of Jane Doe 4. This is the second declaration by Jane Doe 4, who previously submitted Exhibit 70 to the Brachfeld Declaration, ECF No. 55-5.

12. Attached as Exhibit 84 is a true and accurate copy of the Supplemental Declaration of John Doe 7. This is second declaration by John Doe 7, who previously submitted Exhibit 73 to the Brachfeld Declaration, ECF No. 55-8.

13. Attached as Exhibit 85 is a true and accurate copy of the Declaration of Jane Doe 8, an employee of the Division of Reproductive Health within the National Center for Chronic Diseases Prevention and Health Promotion, within CDC.

14. Attached as Exhibit 86 is a true and accurate copy of the Declaration of Kristen Good, Health Equity Branch Deputy Chief within the Disease Control and Public Health Response Division of the Colorado Department of Public Health and Environment.

15. Attached as Exhibit 87 is a true and accurate copy of the Supplemental Declaration of Eli Rosenberg, PhD, Director of the Office of Science at the New York State Department of Health. This is a supplemental declaration by the same declarant who submitted Exhibit 25 to the First Navedo Declaration, ECF No. 44-25, which was filed with exhibits as Exhibit 75 to the Brachfeld Declaration, ECF No. 55-10.

16. Attached as Exhibit 88 is a true and accurate copy of the Supplemental Declaration of Michelle Davis, Deputy Commissioner of the Office of Public Health within New York State Department of Health. This is a supplemental declaration by the same declarant who submitted Exhibit 37 to the First Navedo Declaration, ECF No. 44-37.

Dated: New York, New York
July 25, 2025

/s/ Andres Ivan Navedo
Andres Ivan Navedo
Assistant Attorney General
Office of the New York State Attorney General